

RECEIVED

DEC 28 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the North)
American Numbering Plan)
_____)

CC Docket No. 92-237

ORIGINAL
FILE

COMMENTS OF BELLSOUTH CORPORATION

William B. Barfield
Thompson T. Rawls II

Suite 1800
1155 Peachtree Street, N.E.
Atlanta, Georgia 30367-6000
(404) 249-2706

Attorneys for:

BELLSOUTH CORPORATION and
BELLSOUTH TELECOMMUNICATIONS, INC.

DATE: December 28, 1992

No. of Copies rec'd
List A B C D E

044

TABLE OF CONTENTS

I.	SUMMARY.....	1
II.	PHASE ONE: OVERALL ADMINISTRATION OF THE NANP.....	4
A.	Bellcore As Administrator.....	4
B.	International Integration and Centralized Administration.....	7
C.	Alternative Dispute Resolution And Negotiated Rulemaking Procedures.....	9
D.	FCC Oversight Of NANP Administration.....	11
E.	NANP Administration Costs.....	13
F.	Other Phase I Issues.....	14
	1. PCS Numbering.....	14
	2. Local Number Portability.....	16
III.	PHASE II: FEATURE GROUP D ACCESS CODES.....	17
A.	Costs And Technical Issues.....	17
B.	Cost Benefit Analysis.....	19
C.	Alternative Technical Approaches.....	19
D.	CIC Assignment And Reclamation Guidelines.....	21
IV.	OTHER ISSUES.....	23
A.	Implementation Of Interchangeable Area Codes.....	22
B.	Allocation Of Interchangeable NPA Codes.....	23
C.	Allocation Of Office Codes (NXXs).....	24
D.	Four-Digit Codes For Feature Group B Access.....	24
E.	Allocation Of Service Codes.....	24
V.	CONCLUSION.....	25

RECEIVED

DEC 28 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the North) CC Docket No. 92-237
American Numbering Plan)
)
_____)

COMMENTS OF BELLSOUTH CORPORATION

BellSouth Corporation and its telephone operating company BellSouth Telecommunications, Inc. ("BellSouth"), hereby file their comments on the Notice of Inquiry (Notice) released by the Commission in the above-captioned docket on October 29, 1992.

I. SUMMARY

The management and leadership skills demonstrated by Bellcore as NANP administrator have been exemplary. Nevertheless, many in the industry question Bellcore's ability to serve as an impartial NANP administrator due to the business interests of Bellcore's owners and the increasingly competitive nature of telecommunications markets. While BellSouth does not share this view, it is imperative that the industry have confidence in the impartiality of the NANP administrator if it is going to continue to be effective in its administrative role. Therefore, BellSouth supports taking whatever steps are necessary to satisfy the industry of such impartiality, including the transfer of the NANP administration from Bellcore to another equally competent administrator.

So long as NANP administration remains with Bellcore, BellSouth favors the adoption of additional measures, which could include formal structural separation between the NANP administrator and the rest of Bellcore, to advance the goal of satisfying the industry of Bellcore's impartiality as NANP administrator. All costs of NANP administration should be jointly funded by the industry pursuant to specific arrangements agreed to by the industry and approved by the FCC.

BellSouth supports the continued international integration and centralized administration of the NANP. Indeed, BellSouth favors a more integrated centralized administration than currently exists. In particular, it is BellSouth's view that the NANP administrator should assign NANP resources at both the NPA and NXX level in accordance with guidelines and criteria developed by the industry and approved by the FCC.

The FCC should allow a reasonable opportunity for the industry to reach consensus on specific NANP issues before attempting to resolve those issues through formal proceedings. However, once it has been established that industry consensus cannot be reached within an appropriate time frame, the FCC should step in to resolve those issues through formal proceedings. Moreover, the FCC should formally endorse NANP code assignment guidelines via expedited rulemaking proceedings to ensure that they are

observed, in the public interest, and can be legally relied upon by the industry.

BellSouth supports the establishment of a standing industry advisory forum to examine and make recommendations on numbering issues. Proposals to materially change the administration or design of the NANP, including those initiated by the NANP administrator, should be submitted to the industry advisory forum for review as a condition to FCC acceptance and industry implementation.

The Commission should allow industry fora currently considering personal communication services (PCS) issues a reasonable opportunity to conclude their work before taking any specific regulatory action in that area. To help ensure a sufficient supply of numbers for PCS and other emerging services both prior to and after implementation of interchangeable NPAs, the Commission should continue to support industry efforts to develop uniform assignment and conservation guidelines for the allocation of NPAs, SACs and central office (NXX) codes.

The many issues associated with implementation of local number portability (LNP) should be examined initially by a newly created industry numbering advisory forum. No further action on LNP is needed by the Commission at this time.

The industry has spent considerable time developing and planning the expansion of Feature Group D CIC codes to a four-digit format. The benefits of moving to a four-digit

Feature Group D access code clearly outweigh the related costs. There does not appear to be any other viable alternative for addressing Feature Group D CIC exhaust. In the absence of a clearly superior alternative, the industry should move forward with its plans to implement four-digit Feature Group D access codes. The FCC should support prudent CIC conservation and reclamation efforts and formally ratify the CIC assignment guidelines ultimately agreed to by the industry.

BellSouth concurs in the Commission's conclusion that it is far too late to consider alternatives to interchangeable NPAs. It also concurs in the Commission's decision to allow the industry to continue to work on developing consensus on allocation guidelines for interchangeable NPA and central office (NXX) codes before taking further action in those areas. However, once those efforts are complete, the Commission should adopt those assignment guidelines by way of an expedited rulemaking proceeding.

II. PHASE ONE: OVERALL ADMINISTRATION OF THE NANP

Phase One of the Notice focuses on who should administer the North American Numbering Plan (NANP) and how its administration might be improved.

A. Bellcore As Administrator

The Commission invites comment on the advisability of transferring NANP administration to an administrator other

than Bellcore.¹

BellSouth concurs in the Commission's observations that the NANP "has been administered over a long period of time with considerable skill and foresight" and is in a number of respects "the envy of the rest of the world."² In discharging NANP administration responsibilities, Bellcore has gone to great lengths to coordinate its decisions with the industry and the rest of the telecommunications world, demonstrating considerable technical expertise and industry leadership in the process. However, despite this commendable performance, many parties believe that the continued administration of the NANP by Bellcore involves an inherent conflict of interest due to the business interests of Bellcore's owners and the increasingly competitive nature of telecommunications markets.³

BellSouth believes that the complexities and demands of NANP administration will increase significantly as domestic and global communications markets become increasingly pluralistic and competitive. It is essential that Bellcore have the full support and confidence of the industry if it is to continue to operate as an effective NANP administrator. As noted above, however, broad industry support for the continuation of Bellcore as NANP

¹ Notice at para. 28.

² Notice at para. 23.

³ Notice at paras. 25 and 26.

administrator, at least under current arrangements, does not exist.

Even the perception of bias, however unjustified, will undermine the efficiency of NANP administration. Such perceptions are certain to interfere with Bellcore's ability to obtain full industry cooperation in performing its administrator responsibilities, and will require the diversion of limited staff resources to defending the impartiality of its decisions and recommendations rather than devoting those resources to more productive uses. Therefore, BellSouth supports taking whatever steps are deemed necessary to satisfy the industry of the impartiality of the NANP administrator while maintaining the competence of the administrator, including the transfer of the NANP administration from Bellcore to an equally competent administrator.

If NANP administration is transferred to another entity, however, that entity must have a strong technical understanding of the public network and the ability to work directly with the industry and to represent its multiplicity of interests in numerous national and international industry fora. The NANP administrator must be able to act impartially and to assess and recommend technically feasible NANP modifications. It is not in the public interest nor will BellSouth support the transfer of NANP administration to any entity which does not meet these performance

criteria. Furthermore, any major restructure or transfer of the current administration must not interfere with the efficient operation of the NANP or jeopardize the timely and successful implementation of planned NANP changes, such as the implementation of interchangeable NPAs (INPA) scheduled for January of 1995.

Until the industry can agree upon a transition plan and so long as NANP administration remains with Bellcore, BellSouth favors the adoption of additional measures, which could include formal structural separation between the NANP administrator and the rest of Bellcore, to advance the goal of satisfying the industry of the administrator's impartiality. Also, BellSouth believes that all costs associated with the operation of NANP administration, regardless of who serves as NANP administrator, should be jointly funded by the industry pursuant to specific arrangements agreed to by the industry and approved by the FCC. These steps will further assure the industry that NANP administration is conducted in an impartial manner and that the costs of administration are shared equitably among those in the industry.

B. International Integration And Centralized Administration

The Notice seeks comments on the costs and benefits of an internationally integrated numbering plan and integrated

centralized administration.⁴

As summarized in the Notice, the NANP currently provides a uniform dialing scheme applicable to eighteen countries, more than a thousand local exchange carriers, several hundred long distance carriers, and more than a hundred million end users.⁵ BellSouth favors the continued operation of the NANP as an internationally integrated numbering plan within World Zone 1. Although it is difficult to quantify the costs of maintaining such a plan, BellSouth believes the benefits of doing so clearly outweigh the costs. International uniformity and centralized administration within World Zone 1 facilitates the primary policy goal of the Communications Act, to wit: "to make available, so far as possible, to all the people of the United States a rapid, efficient, Nation-wide, and world-wide wire and radio communications service. . ."⁶

Indeed, BellSouth favors a more integrated centralized administration than currently exists. In particular, BellSouth believes that the NANP administrator should assign all NANP resources at both the NPA and NXX level.⁷ Those

⁴ Notice at para. 28.

⁵ Notice at para. 23.

⁶ 47 U.S.C. Section 151.

⁷ Currently, with the exception of NXX codes associated with Service Access Codes (SACs) and the 809 NPA serving Bermuda and the Caribbean, NXXs are assigned by the dominant local exchange carrier in the geographic area associated with the corresponding NPA. NXXs associated with the 809

assignments should be in accordance with guidelines and criteria developed by the industry and approved by the FCC. With the exception of some SACs, NANP resources should generally not be assigned below the NXX level (e.g. shared NXX codes) because of the additional costs, as well as administrative and billing problems associated with such assignments. Recipients of directly assigned NANP resources such as NXXs should perform all administrative functions within those assignments in accordance with industry established guidelines. This approach would better promote uniformity and consistency in the administration of NANP numbering resources throughout World Zone 1 than the current administrative structure.

C. Alternative Dispute Resolution And Negotiated Rulemaking Procedures

The Commission asks whether the mediation or arbitration techniques as provided by alternative dispute resolution and negotiated rulemaking can be fruitfully applied to situations where the industry is unable to achieve consensus on NANP issues.⁸

BellSouth does not believe that numbering issues lend themselves to such procedures. Only a limited number of representatives may participate in such a process. It would be extremely difficult to determine who should participate

NPA and SACs (e.g., 800 and 900 services) are currently assigned by the NANP administrator (i.e., Bellcore).

⁸ Notice at para. 31.

in such proceedings. There are no established procedures for determining representation among industry segments, much less representatives for individual companies with conflicting views within each industry segment. Industry segments are becoming increasingly difficult to identify as traditional communications markets converge and new markets emerge. Moreover, the inability to reach consensus on numbering issues tends to center on policy rather than technical issues. Such procedures do not appear to be particularly useful for resolving policy disagreements. Therefore, BellSouth does not generally support the application of mediation, arbitration and negotiated rulemaking procedures as a means to achieve industry consensus on NANP issues.

BellSouth's present view is that the most effective tool for facilitating industry consensus is to provide those working on numbering issues with a firm deadline for reaching consensus, after which date unresolved issues would be submitted to the appropriate regulatory body for resolution. Since the FCC takes the position that it has plenary jurisdiction over NANP disputes,⁹ BellSouth favors a process whereby numbering issues are first addressed in an appropriate industry forum, but submitted to the FCC for resolution if industry consensus has not been reached by a specified date. This approach encourages parties to reach

⁹ Notice at para. 6.

industry consensus to avoid the resolution of issues in regulatory proceedings, and provides a definite process for breaking deadlocks within the industry if consensus is not reached. Moreover, if an issue is contentious and industry consensus unlikely, FCC approval is probably necessary to ensure compliance with whatever solution is ultimately implemented by the industry.

D. FCC Oversight Of NANP Administration

The Notice seeks comment on how the FCC should oversee NANP administration, including whether some other advisory or oversight body should be established.¹⁰

The FCC should continue to maintain the oversight role that it has traditionally occupied concerning NANP administration. That is, although the FCC has plenary jurisdiction over the NANP, it should allow a reasonable opportunity for the NANP administrator and the industry to reach consensus on specific issues before attempting to resolve those issues through formal proceedings. However, once it has been established that industry consensus cannot be reached within some appropriate time frame, the FCC should step in to resolve those issues through formal proceedings.

The FCC should also formally endorse NANP code assignment criteria via expedited rulemaking proceedings to ensure that they are observed, in the public interest, and

¹⁰ Notice at para. 32.

can be legally relied upon by the industry. NANP assignment guidelines and criteria should be subject to FCC enforcement through the standard complaint process. However, for minor disputes which do not affect the industry as a whole, the Commission may want to consider the use of mediation or arbitration techniques as provided for in alternative dispute resolution procedures.

BellSouth supports the establishment of a standing industry advisory forum to examine and make recommendations on NANP numbering issues. This forum would differ from existing fora in that its responsibilities would cover all aspects of numbering issues as advocated by the NANP administrator in its description of a NANP advisory council contained in its Long Term Numbering Plan (LTNP) proposal.¹¹ This body should be formally recognized by the FCC as the proper industry forum for addressing numbering issues and should be open to all interested parties. The advisory forum should have a close working relationship with the NANP administrator and work directly with industry standards bodies conducting technical work affecting numbering issues. Recommendations from the advisory forum regarding the NANP should be based upon industry consensus and submitted to the FCC for formal approval.

The establishment of an advisory forum for numbering

¹¹ North American Numbering Plan Administrator's Proposal On The Future Of Numbering In World Zone 1, Bellcore IL-92/01-013, dated January 6, 1992.

issues will facilitate the resolution of issues concerning NANP administration and design through industry consensus rather than regulatory intervention. Proposals that materially change the administration or design of the NANP, including those initiated by the NANP administrator,¹² should be submitted to the advisory forum for review as a condition to FCC acceptance and industry implementation. The advisory forum should attempt to resolve technical issues via industry consensus, consistent with appropriate industry standards work. The advisory forum should assist federal and state regulatory agencies in solving issues before them that involve the NANP.

E. NANP Administration Costs

The Notice seeks comments on how the cost of national administration should be handled, including issues relating to the costs of area code administration performed by the NANP administrator.¹³

As stated above, BellSouth believes that NANP administration costs should be jointly funded by the industry. Administration costs should be shared by entities that request and/or receive NANP resources based on some equitable cost recovery methodology, preferably developed by the advisory forum designated by the Commission with

¹² For example, proposals by the NANP administrator to assign INPAs should be subject to this process.

¹³ Notice at para. 35.

responsibility for reaching industry consensus on numbering issues. The method of funding the ongoing administration of the NANP should be an early priority of the industry advisory forum.

F. Other Phase I Issues

The Notice seeks comment on two other issues in Phase I of this proceeding.

1. PCS Numbering

The Notice seeks comment on what actions should be taken by the Commission to foster personal communications services (PCSs).¹⁴

Consistent with previous comments, the Commission should allow industry fora currently considering PCS issues a reasonable opportunity to conclude their work before taking any specific regulatory action. Such activities presently include the efforts of the American National Standards Institute accredited Committee T1 sponsored by the Exchange Carriers Standards Association, the TR45.4 subcommittee of the Telecommunications Industry Association, and the International Telegraph and Telephone Consultative Committee (CCITT).¹⁵ The NANP administrator also recently initiated an issue at ICCF to form an industry workshop to establish Personal Communication Services NXX assignment guidelines. The Commission should continue to support these

¹⁴ Notice at para. 40.

¹⁵ Notice at n.50.

efforts unless it becomes clear that industry consensus cannot be achieved in these fora within relevant time frames.¹⁶

To ensure sufficient availability of numbers for PCS and other new services both prior to and after implementation of INPA in 1995, the Commission should continue to support industry efforts to develop uniform assignment and conservation guidelines for the allocation of NPAs, SACs and central office (NXX) codes. Once these guidelines and conservation steps have been agreed to by the industry, the Commission should move quickly to adopt them as formal Commission policy. This will ensure the industry, as well as the NANP administrator and current central office code administrators such as BellSouth Telecommunications, Inc., that the guidelines are in the public interest and have the full support of the Commission. Formal Commission action will minimize disputes concerning the fairness and enforceability of those guidelines, thereby enhancing the overall efficiency of NANP administration. Otherwise, adherence to the guidelines will depend upon the voluntary cooperation of the industry, and the enforceability and legal status of the guidelines will remain uncertain.

¹⁶ The Commission should consider the possibility of consolidating at least some of these issues under the auspices of an industry advisory forum charged with overall review of numbering issues. See Comments at pp. 12-13.

2. Local Number Portability

The Notice seeks comments on the cost and feasibility of local number portability, including information on the lessons learned from implementing number portability for 800 services.¹⁷

While BellSouth recognizes the conceptual appeal of local number portability (LNP) as an industry goal, there are no technically or economically feasible solutions for implementing LNP within the existing public switched network in the near term. LNP, in its purest form, would require additional call processing via centralized databases for almost every call placed using NANP resources. The additional technical work required and the total costs associated with providing LNP are enormous. Not only will LNP require an increase in call processing and transmission capacity for the entire public switched telephone network, there are numerous billing and operations support systems which will have to be modified to accommodate LNP. In essence, the entire industry would have to transform network and support systems that are currently based on geographic network locations for routing and rating purposes to systems that are based on non-geographic factors.¹⁸ The

¹⁷ Notice at para. 41.

¹⁸ There are a few exceptions such as 800 database and other SAC services. However, even these limited exceptions have required considerable industry cooperation, coordination and expense to implement.

infrastructure of the public switched telephone network was not designed for number portability and will require substantial changes to support it.

Despite the daunting magnitude of the LNP challenge, the Commission should support industry efforts to investigate the feasibility of and possible alternatives to LNP. Again, BellSouth favors an approach whereby the issue is initially submitted to an industry numbering advisory forum for examination. The numbering advisory forum should solicit input from the entire industry on the feasibility of LNP and then attempt to develop industry consensus on how best to proceed with the issue, including the desirability and possibility of pursuing near term alternatives.

III. PHASE II: FEATURE GROUP D ACCESS CODES

The Notice seeks comment on the following questions regarding expansion of feature group D access codes (Carrier Identification Codes or "CICs") in 1995.

A. Costs And Technical Issues

The Notice seeks comment on the costs and technical issues associated with converting Feature Group D CIC codes to a four-digit format.¹⁹

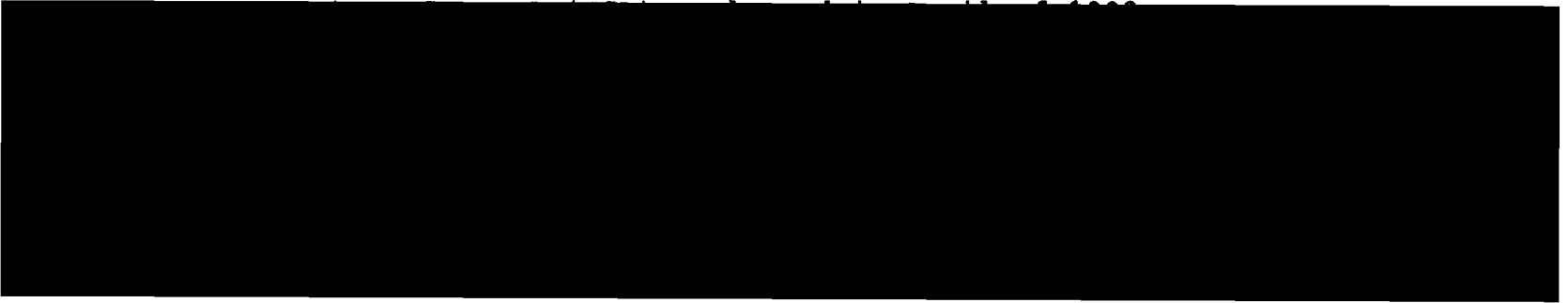
The implementation of CIC expansion will necessitate significant expenditures, both capital and expense. The most immediately identifiable cost impact is the requirement that all equal access switching equipment be modified to

¹⁹ Notice at para. 38.

support the expanded four-digit CIC format. This generally requires the upgrading of switching machines to the appropriate software generic or may even involve total switch replacement for some carriers. Each switch vendor has a scheduled software release that will accommodate four-digit CIC expansion and each LEC must work with those vendors to deploy the appropriate release. The cost of switch conversion for BellSouth alone is estimated to be almost \$40 million for the region.

In addition to switch related costs, it is anticipated that network signaling systems, as well as a number of billing and operations support systems (OSSs) will require modification. Modifications are required in all systems which operate on data that contains a CIC field. SS7 and ISDN signaling systems, and billing systems which bill toll and local usage, recurring and nonrecurring subscriber charges, and carrier access charges will require modification. It is estimated that modifications to over two hundred software programs will be necessary within BellSouth. Extensive coordination will be required for performing these changes to avoid adversely affecting existing operations and services.²⁰

²⁰ A more detailed description of the technical requirements to enable the increase in FGD CIC capacity may be found in the Bellcore document entitled TR-NWT-001050, Expansion of Carrier Identification Code Capacity for



B. Cost Benefit Analysis

The Notice seeks comment on the benefits of moving to four-digit Feature Group D access codes.²¹

If the market, regardless of its size, dictates that expansion is necessary to meet the requirements of interstate access customers, BellSouth supports moving to four-digit Feature Group D access codes. In addition to addressing market needs, the industry must consider the fact that FG D CICs are currently used to satisfy equal access obligations under the Commission's rules as well as under the Modification of Final Judgement. The industry benefits to be derived from continuing to satisfy these needs are obvious. Therefore, the industry should benefit from moving to four-digit Feature Group D access codes unless a more cost effective alternative can be found that satisfies both market and equal access needs.

C. Alternative Technical Approaches

The Notice seeks comment on whether there are alternative technical approaches that would allow all long distance carriers and other end users to achieve equal access.²²

The industry, under the auspices of the Industry Carriers Compatibility Forum (ICCF), recently addressed this question when it reexamined the four-digit CIC expansion

²¹ Notice at para. 38.

²² Notice at para. 38.

Plan Of Record (POR). Those efforts focused on whether there were any viable alternatives to the POR.

The ICCF effort resulted in a detailed examination of a "sectorization" proposal. In general, this alternative would utilize the current three-digit CIC in the 10XXX carrier access code (CAC) format but allow identical CICs to be used in different parts (i.e., sectors) of the country. Successful implementation of this proposal requires the identification of those CICs used solely on a local basis (i.e., within designated geographic sectors). Those local CICs would then be reassigned and reused in other sectors of the country. After considerable discussion, industry consensus could not be reached on the sectorization proposal.

In addition to examining the sectorization proposal, a subgroup within ICCF was formed to examine whether other alternatives existed which still allowed all long distance carriers and other end users to be treated equally for access purposes. In short, this group concluded that there were none.

Thus, the industry has already spent considerable time and effort in examining possible alternatives to the four-digit CIC expansion plan and found that none exists, at least none on which the industry could agree and which also provided the same dialing access to all customers. Moreover, certain costs have already been incurred and

various commitments made by LECs and switching vendors to expand to four-digit CICs and the new FG D CAC format (i.e., 101XXXX). Therefore, it would not be prudent in the absence of a clearly superior solution to move to an alternative access plan at this late date.

D. CIC Assignment And Reclamation Guidelines

The Notice seeks comments on what rules should govern the assignment, recall, transfer and use of Feature Group D codes if that resource is not expanded.²³

As an outgrowth of the activity described in the previous section to these comments, additional steps were taken by the industry to conserve CIC resources. First, an aggressive reclamation effort to reclaim unused CICs has been initiated and coordinated by the NANP administrator. Secondly, an ICCF workshop was conducted to address CIC assignment guidelines which ultimately were adopted via industry consensus.

The ICCF CIC assignment guidelines are based upon the assumption that FG D access codes will be expanded to four-digits. If for any reason that is not the case, then the ICCF CIC assignment guidelines must be revisited and can not be viewed as representing industry consensus. The degree to which the existing ICCF CIC assignment guidelines will remain viable will, of course, depend on the particulars of any adopted alternative. In the absence of knowing the

²³ Notice at para. 38.

alternative, BellSouth is not prepared to comment further on what guidelines should apply.

Regardless of the ultimate outcome of CIC expansion, the FCC should support prudent CIC conservation and reclamation efforts. Specifically, BellSouth urges the Commission to formally ratify, by way of rulemaking, the CIC assignment guidelines ultimately agreed to by the industry. This will facilitate CIC reclamation efforts, help to delay further CIC exhaust²⁴, and ensure that those parties who abide by the guidelines will not be competitively disadvantaged relative to those who refuse to cooperate because of their voluntary nature.

IV. OTHER ISSUES

A. Implementation Of Interchangeable Area Codes

In the Notice, the Commission states that its far too late to consider alternatives to INPA, and concludes that it will not open the issue.²⁵

BellSouth concurs in the Commission's conclusion. The existing supply of NPA codes in the traditional N0/1X format is already exhausted. While contingency plans exist to provide additional area codes through either N00 or N11

²⁴ BellSouth remains extremely concerned that the anticipated increase in demand for CICs resulting from implementation of ONA, expanded interconnection opportunities, and other new services will deplete the expanded pool of FG D four-digit codes much more quickly than is currently suggested by the recently adopted ICCF CIC assignment guidelines.

²⁵ Notice at para. 43.

codes, the use of these codes raises a number of other concerns and problems which have not been resolved, including the possible use of those codes for other service applications, such as for personal communication services and local abbreviated dialing services for accessing information services. Therefore, it is imperative that the industry move forward with INPA to ensure the continued availability of NANP resources to meet the industry's needs.

B. Allocation Of Interchangeable NPA Codes

In the Notice, the Commission concludes that it will not simultaneously attempt to examine the issue of guidelines for allocation of INPA codes while that issue is being examined by the NANP administrator.²⁶

BellSouth supports the Commission's position that the NANP administrator and the industry should be allowed additional time to complete the development of allocation guidelines for interchangeable NPA codes before examining that issue.²⁷ However, once that effort is complete or it becomes clear that industry consensus will not be reached, the Commission should adopt assignment guidelines for interchangeable NPAs by way of an expedited rulemaking proceeding.

²⁶ Notice at para. 44.

²⁷ The ICCF has recently agreed to establish a workshop to develop INPA assignment guidelines.